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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of

Access Charge Reform for Incumbent
Local Exchange Carriers Subject to
Rate-of-Return Regulation

CC Docket No. 98-77

COMMENTS
of the
GENERAL SERVICES ADMINISTRATION

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Summary

To foster open competition, the Commission must prescribe an economically efficient access charge system for all local exchange carriers. Moreover, a system reflecting underlying cost structures is particularly important for the rate-of-return LECs because interstate access charges are a much larger part of total revenues for most of these smaller companies, and it is much more difficult to foster competition in the suburban and rural areas that they generally serve.

The access reforms prescribed for price cap carriers in 1997 can serve as a model for rate-of-return carriers. The access charge structure prescribed for price cap LECs offers the essential feature of sharply reduced dependence on usage charges to recover non-traffic sensitive costs. Moreover, the structure includes a Centrex equivalency factor to scale the presubscribed interexchange carrier charge ("PICC") for Centrex lines, permitting level competition with PBX services.

The structure prescribed for price cap LECs is a pro-competitive step, but it should be improved further for use with rate-of-return carriers. As a major step, the Commission should sharply reduce or eliminate disparities in the caps on subscriber line charges ("SLCs") and PICCs for different groups of users.

Distinctions in the monthly caps for different types of lines are not justified by cost structures. Moreover, they introduce a cross-subsidy into the access charge structure that is antithetical to competition and unfair to many users. To provide more cost-based access charge structures for rate-of-return LECs, GSA urges the Commission to prescribe identical SLC and PICC caps for business multi-lines and non-primary residence lines.

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**COMMENTS
of the
GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Commission's Notice of Proposed Rulemaking ("NPRM") released on June 4, 1998.¹ The NPRM invites comments and replies on proposals to modify the access charge structure employed for the local exchange carriers ("LECs") subject to rate-of-return regulation by this Commission.

I. INTRODUCTION

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs require a wide array of interexchange and local telecommunications services throughout the nation. From their perspective as end

¹ CC Docket No. 98-77, Notice of Proposed Rulemaking, released June 4, 1998.

users, the FEAs have consistently supported the Commission's efforts to bring the benefits of competitive markets to consumers of all telecommunications services.

An economically efficient system of interstate access charges is necessary to foster open competition for telecommunications services. Last year, the Commission conducted a comprehensive review of the interstate access charge structures for price cap carriers which produced a system designed to meet the requirements for open competition in their markets.² This proceeding provides an opportunity to conduct a similar review of the access charge structures for the LECs subject to rate-of-return regulation by this Commission.

II. AN ECONOMICALLY EFFICIENT ACCESS CHARGE SYSTEM IS NECESSARY FOR ALL LOCAL EXCHANGE CARRIERS.

A. The existing access charge structure for rate-of-return carriers impedes open competition.

The access charge system now employed to compensate rate of return LECs for their access facilities and services is economically inefficient. In fact, the access rate structures for these facilities and services are harmful to end users and incumbent carriers because they impede open competition.

The most important deficiency in the access charge structures for rate-of-return LECs lies in the procedure for recovering common line costs that are associated with the dedicated facilities connecting the end user's premises with the telephone company central office. The common line costs of rate-of-return carriers are partly recovered through subscriber line charges ("SLC's"), which are the only access

² GSA participated actively in those proceedings by filing comments jointly with the U.S. Department of Defense. GSA filed four sets of comments addressing access charges for price cap carriers in Docket No. 96-262. These included GSA/DOD Comments, January 29, 1997; GSA/DOD Reply Comments, February 14, 1997; GSA/DOD Comments on Notice of Inquiry, March 24, 1997; and GSA/DOD Reply Comments on Notice of Inquiry, April 23, 1997.

charges assessed directly on their end users.³ However, the SLCs currently do not recover all common line costs because they are subject to caps of \$3.50 per month for residence and single line business lines, and \$6.00 per month for multi-line business users. Under the existing system, any common line costs not recovered through the SLCs are assessed through carrier common line (“CCL”) charges imposed on interexchange carriers (“IXCs”). This rate structure does not conform with the structure of costs, because CCLs are assessed as per-minute charges, while the costs for a common line do not vary with usage at all.

The same economically inefficient access structure was previously employed for the LECs under price cap regulation. However, the Commission revised the access charge structures for those carriers, noting that the implicit subsidies they contained could not be sustained in a competitive environment.⁴ The Commission reduced dependence on usage-based charges to recover non-traffic sensitive costs by increasing the SLC caps for some lines, and by instituting a new charge — called the presubscribed interexchange carrier charge (“PICC”) — levied on interexchange carriers. While this new system could be improved further, it offers the essential feature of sharply reduced dependence on usage charges to recover non-traffic sensitive costs. Therefore, it can serve as a model for rate-of-return LECs in this respect.

B. Access reform is especially critical for LECs under rate-of-return regulation.

Access reform for LECs under price cap regulation was critical, but it is possibly even more important to address the access charges for rate-of-return LECs. Some

³ Access Charge Reform, *et al.*, CC Docket No. 96-262 *et al.*, First Report and Order, FCC 97-158, released May 16, 1997 (“First Report and Order”), para. 23.

⁴ *Id.*, para. 32.

rate-of-return carriers receive more than one-half of their total revenues from interstate access charges and universal service support, compared to only 25 percent on average for the price cap LECs.⁵

Moreover, significant regulatory changes are necessary to foster open competition in regions served by rate-of-return carriers. Most of these LECs have access costs greater than those for price cap carriers.⁶ Since the rate-of-return carriers serve suburban and rural areas that are much less densely populated, these carriers have longer local loops and more extensive trunking facilities. Also, many rate-of-return LECs incur unusually high costs to install outside plant because of rugged terrain. In addition, since the rate-of-return LECs have smaller subscriber bases, they do not benefit from the same economies of scale as the price cap LECs. Moreover, in many cases, rate-of-return LECs receive a significant portion of their total revenue from only a handful of multi-line businesses in their operating area.

In short, most rate-of-return carriers serve areas where very little competition has developed so far and where much additional competition is unlikely to emerge in the near future. Since the Telecommunications Act of 1996⁷ promises the benefits of competition to all Americans, it is very important that the Commission take equally comprehensive steps to reform the access charge structures for rate-of-return LECs.

⁵ NPRM, para. 15.

⁶ *Id.*, para. 16.

⁷ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, amending the Communications Act of 1934, 47 U.S.C. § 151 *et seq.* ("Telecommunications Act").

III. THE ACCESS REFORMS PRESCRIBED FOR PRICE CAP CARRIERS CAN SERVE AS A MODEL FOR RATE-OF-RETURN CARRIERS.

A. The Commission proposes an access charge structure similar to that adopted for price cap carriers.

In the NPRM, the Commission proposes rate structure modifications for rate-of-return LECs that are similar to those prescribed for price cap LECs.⁸ The NPRM indicates that these modifications will remove implicit subsidies and ensure that access charges reflect the structure of access costs, as mandated by the Telecommunications Act.⁹

For LECs under price cap regulation, the Commission increased the SLC caps for some types of lines. Previously, the SLCs were capped at \$3.50 per month for all residence and single-line business lines, and \$6.00 per month for multi-line business users. The Commission did not modify the caps for primary residence or single-line business lines in 1997, but authorized a 50 percent increase in the cap for multi-line businesses to \$9.00 per month in 1997, with subsequent annual adjustments for inflation.¹⁰ Also, the Commission prescribed a procedure for increasing the monthly SLC cap for non-primary residence lines until that charge equals the ceiling for multi-line business users.¹¹ Under this procedure, the cap for non-primary residence lines increased from \$3.50 a month to \$5.00 a month on January 1, 1998, and will increase by \$1.00 each year until 2002.

The Commission also established different caps for the monthly charges based on presubscribed residence and business access lines for LECs under price cap

⁸ NPRM, para. 35.

⁹ *Id.*

¹⁰ First Report and Order, para. 78.

¹¹ *Id.*

regulation. The Commission capped the PICCs for primary residence and single-line business lines at \$0.53 per month for the initial year, commencing January 1, 1998.¹² In subsequent years, this monthly cap could be increased by \$0.50 each year until revenues from the SLCs and PICCs collectively met the carrier's common line revenue requirement.¹³

Furthermore, the Commission set initial ceilings of \$1.50 per month for the PICC on non-primary residential lines and \$2.75 per month on multi-line business lines, with increases in subsequent years.¹⁴ The PICCs for non-primary residential and multi-line business lines also may be adjusted annually for inflation. These PICCs may increase by as much as \$1.00 and \$1.50, respectively, in each year until revenues from the SLCs and PICCs collectively meet the carrier's common line revenue requirement.¹⁵ As discussed in more detail subsequently in these Comments, the Commission also ruled that the PICC for Centrex lines would be one-ninth of the amount for a PBX trunk in most cases.

The NPRM invites comments on whether these same rate structures should be employed for rate-of-return LECs.¹⁶

¹² *Id.*, para. 94.

¹³ *Id.*

¹⁴ *Id.*, para. 59.

¹⁵ In setting the PICCs for price cap carriers, the Commission anticipated that changes in telecommunications volumes and cost functions would eventually permit reductions in PICC caps, even if all of the common line revenue requirement was to be met by SLCs and PICCs. When overall reductions were possible, the Commission contemplated that price cap LECs would initially reduce PICCs for multi-line business lines in order to ameliorate disparities between these charges and those applying to non-primary residential lines. See *Id.*, para. 59 and NPRM, para. 31.

¹⁶ NPRM, para. 36.

B. Access charge structures should conform with the costs incurred by rate-of-return carriers.

While the new structures designed for price cap carriers significantly reduce the dependence on usage-based charges to recover non-traffic sensitive costs, they should not be employed for rate-of-return LECs without modification. As the NPRM acknowledges, some modifications should match the cost structures of rate-of-return carriers more closely than is necessary for price cap LECs.¹⁷

Moreover, the access charge system adopted for price cap carriers should be modified for rate-of-return LECs for an additional reason. There is no basis for the disproportionately large charges on most business access lines.

IV. THERE IS NO ECONOMIC BASIS FOR DIFFERENT ACCESS CHARGES FOR BUSINESS AND RESIDENCE ACCESS LINES.

A. Differences in business and residence access charges do not reflect costs.

The NPRM invites parties to discuss whether residence and business access lines for rate-of-return LECs should be treated differently in assessing SLCs and PICCs.¹⁸ The primary issue is whether residential lines should be assessed lower PICCs than multi-line business lines, as for price cap LECs, or whether a uniform PICC should be applied to spread the revenue requirement evenly across these classes of customers.¹⁹

The NPRM accurately identifies the policy issue as an economic question. The short answer is that the access charge system adopted for price cap LECs does not

¹⁷ *Id.*, para. 37.

¹⁸ NPRM, para. 42.

¹⁹ *Id.*

fully recognize the concept of cost causation and perpetuates uneconomic cost recovery methods.

Indeed, there is no cost basis for a difference in monthly access charges for business and residence lines. The SLCs and PICCs are employed to recover non-traffic sensitive costs, so that any differences in traffic levels between business and residence users would not support distinctions between the charges.

Moreover, the fixed monthly access costs are not greater for business lines than for residence lines. In fact, for all lines provided by a LEC, or the lines provided within any study area, the costs associated with access for multi-line business users will average much less than the access costs for other subscribers because business and government users are usually located in densely populated areas where local loops to the telephone company central offices are shorter and where there are greater economies of scale in providing telecommunications services.

B. Disparities in charges for business and residence lines introduce new cross-subsidies in the access charge structure.

The access charges adopted for price cap LECs have disparate impacts on business and residence users. In the initial year, the maximum total SLC and PICC for a primary residential line increased from \$3.50 to \$4.03.²⁰ In contrast, the maximum total for a multi-line business line increased from \$6.00 to \$11.75.²¹ The initial increase of \$5.75 monthly for multi-line business lines is more than 10 times the \$0.53 monthly increase for primary residential lines. The result is a business charge nearly three times that for residence service, with no cost difference at all.

²⁰ Previously a SLC of \$3.50 and no PICC, with no change in the SLC but a PICC of \$0.53.

²¹ Previously as SLC of \$6.00 and no PICC, with the SLC increased to \$9.00 and a PICC of \$2.75.

Furthermore, in reducing the cross-subsidy of lower volume users by higher volume users, another cross-subsidy is highlighted in the access charge structure for price cap LECs. Business lines with the same (or even lower) access costs are subject to far greater monthly access charges than the corresponding residential lines. This business-to-residence cross-subsidy is also unjustified and anti-competitive.

Moreover, in addition to the fact that distinctions between access charges for business and residence subscribers are not justified by costs and antithetical to open competition, these distinctions no longer have a practical or administrative basis. The difference between "residence" service and "business" service is becoming arbitrary as more individuals telecommute and employ modems in their homes and offices for both "personal" and "business" use.

V. MONTHLY ACCESS CHARGES FOR RATE-OF-RETURN CARRIERS SHOULD REFLECT COSTS AS NEARLY AS POSSIBLE.

A. Identical caps should be employed for business multi-lines and residence non-primary lines.

The access charge structures prescribed for price cap carriers meet some of the requirements for rate rationalization that are necessary to foster open competition for telecommunications services. Price cap carriers will recover almost all non-traffic sensitive costs through the fixed monthly SLCs and PICCs within the next few years. This step will ameliorate the cross subsidy of lower volume users by higher volume users. However, in setting the structure for rate-of-return LECs, the Commission should recognize cost causation principles more completely.

In the First Report and Order, the Commission addressed the need to maintain affordable basic telephone service by prescribing lower access charges for residence and single-line business customers than for non-primary residence and multi-line

business users.²² GSA has consistently supported the goals of universal service. Historically, universal service goals have been focused on providing individual customers with access to basic telephone services. This requirement is reiterated in the Commission's Universal Service Order, which provides that a single telephone line to an individual residence or business is the basic component of universal service.²³ Thus, while universal service goals may support lower charges for an initial residence or business line, they do not support access charges for multi-line business lines that are above those for non-primary residence lines.

As the first step, GSA urges the Commission to prescribe an access charge structure for rate-of-return LECs that contains identical SLCs and PICCs for business multi-lines and non-primary residence lines. As an example, instead of employing SLC caps of \$5.00 per month for non-primary residence lines and \$9.00 per month for business multi-lines, as for price cap LECs at this time, the same cap, say \$7.50, would be prescribed for both types of lines. Similarly, a single PICC cap would be used in place of the \$1.50 per month for non-primary residence lines and \$2.75 per month for business multi-lines now prescribed for price cap LECs.

B. An equivalency factor is necessary to equalize charges for Centrex and PBX systems.

Most large business users and government agencies employ either Centrex or PBX systems for access to the public switched network. These services provide the same functionality, so it is necessary to carefully balance the access charges to permit level competition between them.

²² NPRM, para. 73.

²³ FCC Order No. 97-157 in CC Docket No. 96-45, released May 8, 1997, para. 61.

With Centrex, each telephone number requires a separate access facility or local loop to the telephone company wire center. In contrast, with PBX systems connections for many numbers may be implemented through a single trunk. If the monthly access rates are the same for Centrex lines and PBX trunks, functionally equivalent systems will bear far different total charges.

Traditionally, SLCs have been the same for Centrex lines and PBX trunks for all carriers, even though this arrangement has resulted in disproportionately high costs for equivalent PBX systems. However, the overall cost disparity was exacerbated in the structure prescribed by the First Report and Order, when the Commission set the PICC for Centrex lines equal to that for PBX trunks.

The Commission reversed the disparity for PICCs in its Second Order on Reconsideration, when it prescribed an equivalency procedure that treats the subscribers for both services more equitably.²⁴ Specifically, the Commission ruled that the PICC for Centrex access facilities would be one-ninth of the PICC for a PBX trunk in most cases.²⁵ This equivalency factor reflected the average line-to-trunk ratio reported by an association of LECs that had petitioned to modify the access charge structure.²⁶ In the present NPRM, the Commission asks for comments on whether it should employ a similar equivalency plan in the access charge structure for rate-of-return LECs.²⁷

²⁴ CC Docket No. 96-262 *et al.*, Second Order on Reconsideration, released October 9, 1997 ("Second Order").

²⁵ The Commission specified an exception if the multi-line business SLC ceiling does not permit the recovery of all interstate loop costs from the end user. In those instances, a somewhat greater PICC may be assessed on Centrex lines.

²⁶ Second Order, para. 38.

²⁷ NPRM, para. 43.

GSA strongly urges the Commission to rule that a similar equivalency procedure is appropriate for rate-of-return carriers. Systems that are functionally equivalent should be subject to the same access charges. As the Commission found for price cap LECs, "it would be inequitable to require Centrex users to cause its presubscribed IXC to bear a significantly larger PICC contribution than do similarly-sized PBX users."²⁸

End users that petitioned the Commission to employ an equivalency factor for price cap carriers underscored the importance of this issue. The County of Los Angeles reported that without an equivalency factor, its taxpayers would be required to support an additional \$2.8 million for PICCs if the county's presubscribed IXC passes through these charges.²⁹ The City of New York estimated a cost increase of \$2.0 million annually for its residents under similar circumstances.³⁰

Furthermore, the International Communications Association ("ICA") and other petitioners argued convincingly that major users of Centrex services are often under long-term contracts with their service provider that prevent them from switching to a PBX system to avoid the additional PICCs.³¹ Even when the contract expires, it can take several years to put an existing large Centrex system up for bid and fully transition to a PBX configuration.³²

²⁸ Second Order, para 35

²⁹ *Id.*, para. 34.

³⁰ *Id.*

³¹ *Id.*, para. 25.

³² *Id.*

As a major user of Centrex and PBX systems, GSA concurs with these observations. GSA urges the Commission to apply Centrex equivalency for rate-of-return LECs, as it did for price cap carriers after further review.

In debating the merits of PICC charges on Centrex lines provided by price cap LECs, several parties argued that since Centrex requires more lines than a PBX arrangement with the same number of stations, it is correct to charge more for Centrex.³³

The Commission has addressed this matter definitively for price cap LECs. In its Second Order, the Commission found that the multi-line business PICC is not simply a cost-based charge, but also a contribution to the recovery of common line costs that incumbent LECs incur to serve single-line customers.”³⁴ Therefore, the Commission concluded, it is appropriate to consider cost and non-cost factors in determining how to assess the PICC.³⁵

Considering all factors, the Commission prescribed use of the line-to-trunk equivalency ratio for determining the PICC for Centrex lines provided by price cap carriers. GSA urges the Commission to employ the same procedure for rate-of-return LECs.

³³ *Id.*, para. 29.

³⁴ First Report and Order, para. 101; and Second Order, para. 31.

³⁵ Second Order, para. 31.

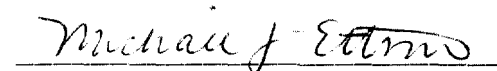
VI. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to modify the access charge system for LECs subject to rate of return regulation as described in these Comments.

Respectfully submitted,

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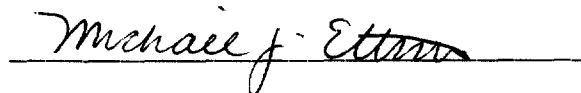
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